

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BRAVE BULK TRANSPORT LTD.,

07 Civ. 4546 (CM)

Plaintiff,

NOTICE OF MOTION

-against-

SPOT ON SHIPPING LTD., a.k.a. SPOT
ON SHIPPING LTD. BVI, a.k.a. SPOT ON,
a.k.a. CLAYTON STAR COMPANY LIMITED
a.k.a. CLAYTON STAR and PHEW ASSET
MANAGEMENT LIMITED a.k.a. PEHW ASSET
MANAGEMENT LTD. and ZHANGGANG SHIPPING
LIMITED,

Defendant.

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PLEASE TAKE NOTICE, that upon the annexed Declaration and the exhibits thereto attached, Memorandum of Law, and all the prior pleadings and proceedings in this action, MAHONEY & KEANE, LLP, (MAHONEY & KEANE) counsel for Defendant ZHANGGANG SHIPPING LIMITED (ZSL), will move the Court before the Honorable Colleen McMahon at the Courthouse located at 500 Pearl Street, New York, New York, for an order, pursuant to Southern District Court Local Rule 1.4, permitting MAHONEY & KEANE to withdraw as counsel for Defendant ZSL and granting such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, New York

May 5, 2008

MAHONEY & KEANE, LLP
Attorneys for Defendant
ZHANGGANG SHIPPING LIMITED

By: 

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